



February 7, 2011

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Suite TW-A325  
Washington, D.C. 20554

Annual 64.2010(e) CPNI Certification for Calendar Year 2010  
EB Docket No. 06-36

Form 499 Filer ID: 815252

Dear Ms. Dortch:

This statement is to certify that ProPage, Inc., has not and does not sell any customer information to anyone or to any company. ProPage keeps all customer information and records, both paper and electronic, in a secure location. Access to this location and the information stored there is strictly limited to a few authorized personnel of ProPage, each of whom has been trained in the need to maintain the strictest security respecting customer proprietary information.

ProPage has trained all personnel to maintain customer records as proprietary information and to not share information with any outside parties. Attached to this certificate is a copy of ProPage's written policy regarding the procedures to be employed for the protection of customer information. ProPage has distributed a copy of this written policy to all personnel.

ProPage did not take any actions against data brokers between January 1, 2010, and the date of this letter. Also, ProPage has never received any customer complaints concerning the unauthorized release of CPNI.

I, the undersigned, hereby certify under penalty of perjury that I am an officer of ProPage and responsible for the preparation of this certificate and oversight of ProPage's compliance with the CPNI rules. I further certify to the truth and accuracy of the information contained in this certificate, that I have personal knowledge of ProPage's operating procedures, and that ProPage has established operating procedures adequate to ensure compliance with the FCC's CPNI rules set forth in §§64.2001 *et seq.*

A handwritten signature in blue ink that reads "Steve Banister".

Steve Banister  
Chief Operating Officer

Attachment  
cc: Enforcement Bureau, FCC (2 copies)  
Best Copy and Printing, Inc. (1 copy)

112 Key Drive • Brunswick, Georgia 31520 • (912) 264-1255 • Fax (912) 264-8495  
1-800-523-2337 • [www.propage.net](http://www.propage.net)

## CUSTOMER INFORMATION POLICY

**To protect the proprietary and private information about our customers, ProPage, Inc., has established this company policy regarding customer information:**

1. All of the company's proprietary data bases, including that containing customer information, are password protected, and access to same is limited to authorized personnel only. Distribution of the password is limited to those authorized personnel. The password will be changed routinely and whenever an employee with access to such data bases leaves the company.
2. No customer information in any form is to be removed from the company's offices by employees or others. This includes computer printouts, handwritten information or notes, photocopies of files or documents or copies in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the company.
3. Employees are to closely guard customer lists, contact information, telephone numbers, mobile code lists and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees, either accidentally or intentionally.
4. The notes a salesperson may make about a customer, number of pagers in use and pager numbers to assist in a sale must be returned to the company's office and re-filed or shredded. If, for example, a salesperson is making a sales call to Customer A to discuss adding more pagers for Customer A, the salesperson may need to take information on the number of pagers already in service at Customer A. This information is to be shared only with the customer who is using those pagers. At the completion of the sales call, the information is to be returned to the office and re-filed or shredded.
5. Internal documents, notes made when customers call in, and anything containing customer names and telephone numbers must be filed or shredded at the end of the business day.
6. Online access will be granted on a case by case basis to customers for the express purpose of equipment maintenance. No CPNI information will be available to these or any other individuals through this access. Access will be granted only through the use of the correct user name and password combination. Company access to this information will be limited to only those employees with responsibility to maintain the access system. In no circumstance will a customer's taxpayer identification number be requested. Company requests for identifying information will be limited to that sufficient to properly complete the billing process.
7. Customer information is never to be used or disclosed to anyone, except as follows:
  - (a) to market the company's service offerings to which the customer already subscribes;
  - (b) to market the company's CPE, information services, and adjunct-to-basic services;
  - (c) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
  - (d) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
  - (e) to resolve specific customer questions about the customer's own account arising in the course of a telephone conversation between that customer and company's service

representative, and then only after orally obtaining from the customer a limited, one-time authorization to use the customer's information for the duration of that phone call.

8. Disconnected or inactive customer files are to be retained for no more than three (3) years, and then shredded. Disconnected or inactive customer files are never to be placed in the trash unshredded. Customer database printouts are to be shredded when replaced by newer printouts.
9. Appropriate disciplinary action will be taken for any violations of this policy.